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Attorneys for McKinsey Defendants

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

IN RE: MCKINSEY & CO., INC. NATIONAL  
PRESCRIPTION OPIATE CONSULTANT  
LITIGATION

This Document Relates to:

All School District Cases  
All Subdivision Cases  
All Third Party Payor Cases  
All Tribal Cases

) Case No. 3:21-md-02996-CRB

) **STIPULATION AND [PROPOSED]**  
) **SETTLEMENT APPROVAL SCHEDULE**  
) **AND NOTICE PROCESSES**

) Judge: Charles R. Breyer

Pursuant to the Joint Status Report (ECF No. 562), the Parties propose this Settlement Approval Schedule and Notice Processes for the School District, Subdivision, Tribal, and Third Party Payor (TPP) Plaintiffs.

**For the School District, Subdivision, and Third Party Payor Plaintiffs:**

For the School District and Subdivision proposed class action settlements, the parties to each are drafting settlement agreements, class notices, and notice programs, and will file their respective motions for preliminary approval under Rule 23(e) no later than August 31, 2023, with hearing thereon to be set by the Court.

For the TPP proposed class action settlement, TPP plaintiffs are drafting the settlement agreement, class notice, and notice program, and will file their motion for preliminary approval under Rule 23(e) no later than September 15, 2023, with the hearing thereon to be set by the Court.

These dates may be reasonably extended by the parties if necessary to finalize the settlements, with notice to the Court of any such extensions.

**For Tribal Plaintiffs:**

The Tribal settlement is a non-class, opt-in settlement that generally follows the process developed in the previous Tribal settlements in MDL 2804. The Tribal settlement agreement and participation forms are being finalized, and the participation process is expected to commence shortly. The parties will provide further information on the progress of this settlement by August 31, 2023.

Respectfully submitted,

Dated: July 27, 2023

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
ELIZABETH J. CABRASER

By: /s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser

Plaintiffs' Lead Counsel

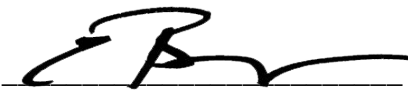
STROOCK & STROOCK & LAVAN LLP  
JAMES L. BERNARD

By: /s/ James L. Bernard  
James L. Bernard

Attorneys for Defendants

**IT IS SO ORDERED.**

DATED: July 28, 2023

  
CHARLES R. BREYER  
United States District Judge